U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Ocean Service
Office of Response and Restoration
Coastal Protection and Restoration Division
290 Broadway, 18th Floor
New York, New York 10007-1866

MEMORANDUM

TO: Mindy Pensak, EPA Region II BTAG Coordinator

FROM: Reyhan Mehran, Coastal Resource Coordinator

SUBJECT: Dayco/L.E. Carpenter Site

Nature and Extent of Lead in Soils and Groundwater, L.E. Carpenter & Company, Wharton, New Jersey, March 2002

Findings & Recommendations Regarding a Conceptual Free-Product Remediation Strategy, L.E. Carpenter & Company, Wharton, New Jersey, March 2002

DATE: June 17, 2002

Thank you for the opportunity to review the documents referenced above. The following comments are provided on behalf of the National Oceanic and Atmospheric Administration (NOAA) for consideration by the Biological Technical Assistance Group (BTAG).

Background:
The Dayco/L.E. Carpenter site is a 14.6-acre site located on the Rockaway River in Wharton, NJ. Approximately 70 acres of wetlands are located adjacent to the site and additional wetlands are located downstream. The L.E. Carpenter facility produced vinyl wall coverings at the site from 1943 to 1987. The manufacturing process generated waste pigments and liquid waste solvents including xylene and methyl ethyl ketone. An unlined impoundment was used for waste disposal from 1963 to 1970. Primary contaminants of concern at the site are xylene, ethylbenzene, bis(2-ethylhexyl)phthalate, and lead. Other metals detected at elevated concentrations include antimony, arsenic, cadmium, chromium, mercury, and zinc. Due to a variety of obstructions to anadromous fish passage and the distance between the site and NOAA trust habitats, it is unlikely that the site poses a current threat to NOAA trust species.

Summary:
Based on isotope analyses, it was determined that lead at the site is most likely from an industrial source and not derived from background rock. A risk-based remediation goal of 902 ppm lead was developed for the site and a cleanup goal of 600 ppm lead was selected based on the New Jersey non-residential soil cleanup goal.

Comments:
It is unclear whether ecological risk associated with sediment contamination of the river and wetlands has been evaluated at the site. An analysis of ecological risk must be conducted and the results should be presented in this report. Determination of whether or not "any further ecological risk assessments are necessary" is one of the stated Project Objectives (pg 7). However this objective is not incorporated into the investigation and no mention is made of this objective elsewhere in the report.

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The lead cleanup goal is described in the report as "risk-based" without any reference to an analysis of ecological risk. The remediation goal for lead (600 ppm) is a non-residential soil cleanup value and is not designed to protect ecological receptors. Areas of lead soil contamination less than 600 ppm may pose a threat to ecological receptors at the site and downstream. Capping or removal of only those soils exceeding 600 ppm lead may not be protective of the environment; further justification needs to be provided.

Any potential contamination in the wetlands adjacent to and downstream of the site needs to be characterized. If this was conducted as part of a surface water and sediment study, the results should be summarized in the subject documents.

The wetlands associated with the Rockaway River and the Air Products drainage ditch should be identified on Figure 2.

If you have any questions regarding these comments or if I can be of further assistance, please feel free to contact me at (212) 637-3257 or at *Reyhan.Mehran@noaa.gov*.

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